

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION**

JESSICA FRYREAR

PLAINTIFF

VS.

CAUSE NO. 4:22-cv-00112-MPM-DAS

**WASHINGTON COUNTY, MISSISSIPPI,
JARRELL EVANS and CEDRICK ADAMS,
in Their Individual Capacities for State Law
Violations Only**

DEFENDANTS

PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME

Plaintiff Jessica Fryrear, by and through counsel, files this Unopposed Motion for Extension of Time within which to file her responses and briefs in opposition to Defendant Washington County, Mississippi's Motion for Judgment on the Pleadings [19] and Motion to Stay [21], and would show unto the Court the following:

1.

Plaintiff's responses and briefs in opposition to Defendants' motions are currently due November 8, 2022. Due to Plaintiff's counsel's schedule, as well as his primary assistant's being absent during the entire week of October 31, 2022, due to COVID-19, Plaintiff requests a two-week extension of time, through and including November 22, 2022, in which to file the responses and briefs.

2.

Counsel for Plaintiff has had and will have work-related scheduling conflicts and deadlines, which preclude him from completing the responses and briefs.

3.

The requested extension of time is made in good faith, is not sought for the purpose of delay or harassment, and would not prejudice Defendant County.

4

Bethany Tarpley, counsel for Defendant County, has courteously represented to undersigned counsel that Defendant County has no objection to the granting of the relief requested herein.

5.

Because this motion is self-explanatory, Plaintiff requests to be relieved from submitting a supporting memorandum.

WHEREFORE, Plaintiff requests that the Court grant her Unopposed Motion for Extension of Time within which to file her responses and briefs in opposition to Defendant Washington County, Mississippi's Motion for Judgment on the Pleadings [19] and Motion to Stay [21], through and including November 22, 2022.

RESPECTFULLY SUBMITTED, this the 7th day of November, 2022.

JESSICA FRYREAR, Plaintiff

By: /s/ Jim Waide

Jim Waide, MS Bar No. 6857

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ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

This will certify that undersigned counsel for Plaintiff has this day filed the above and foregoing with the Clerk of the Court, utilizing the federal court electronic case data filing system (CM/ECF), which sent notification of such filing to the following:

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DATED, this the 7th day of November, 2022.

/s/ Jim Waide

Jim Waide